UNITED STATES BANKRUPTCY COURT
DISTRICT OF KANSAS AT KANSAS CITY

In re:	)	
	)	
JOHN Q. HAMMONS FALL 2006, LLC, *et al.*,	)	**Case No. 16-21142**
	)	**(Jointly Administered)**
Debtors.	)	
	)	**[ECF Docs. 1169, 1171, 1268]**

JOINT MOTION TO CONTINUE HEARING ON (1) INDEPENDENT DIRECTORS' MOTION FOR PAYMENT OF FEES AND EXPENSES OF PROTIVITI, INC., (2) INDEPENDENT DIRECTORS' MOTION FOR TURN OVER OF INFORMATION, AND (3) MOTION OF INDEPENDENT DIRECTORS TO ENFORCE ARBITRATION PROVISION OR ALTERNATIVELY PAYMENT OF ATTORNEYS' FEES AND EXPENSES

COME NOW the debtors-in-possession in the jointly-administered cases captioned above (the "Debtors") and the independent managers and directors (hereinafter, the "Independent Directors") jointly request the entry of an order continuing the hearing on the Motion of Independent Directors for Payment of Fees and Expenses of Protiviti, Inc. [ECF Doc. 1169], the Independent Directors' Motion for Turnover of Information [ECF Doc. 1171], and the Motion of Independent Directors to Enforce Arbitration Provision or Alternatively Payment of Attorneys' Fees and Expenses [ECF Doc. 1268] (together, the "Independent Director Motions") set for September 23, 2017 at 1:00 p.m. to the next omnibus hearing set for October 23, 2017 at 1:00 p.m. (the "Motion"). In support of the Motion, the Debtors and Independent Directors jointly state:

1. On August 11, 2017 and September 1, 2017, the Independent Directors filed the Independent Director Motions.

2. On August 23, 2017, the Debtors filed Debtors' Objection to Independent Directors' Motion for Turnover of Information [ECF Doc. 1204] and Debtors' Objection to Motion of Independent Directors for Payment of Fees and Expenses of Protiviti [ECF Doc. 1205].

3. On September 11, 2017 the Debtors filed Debtors' Response in Opposition to Motion of Independent Directors to Enforce Arbitration Provision or Alternatively Payment of Attorneys' Fees and Expenses [ECF Doc. 1293] (collectively with ECF Docs. 1204 and 1205, the "Debtors' Objections").

4. Subject to bankruptcy court approval, the Debtors and the Independent Directors have reached a resolution of the issues raised in the Independent Director Motions and the Debtors' Objections and are preparing a stipulation and proposed order that will require a motion to approve and notice to creditors.

5. The parties request a continuance of the hearing on the Independent Director Motions to permit additional time for the parties to complete these documents and provide notice.

6. The parties request that the hearing be continued to a date to be set after the stipulation is executed.

7. No party will be prejudiced by the relief requested herein. Both the Independent Directors and the Debtors are requesting the continuance.

WHEREFORE, the Debtors and the Independent Directors jointly request the entry of an order continuing the hearing on the Independent Directors Motions to a date to be set in the future and granting such other and further relief as is just and proper.

Respectfully submitted,

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